

**From:** [Kler, Denis](#)  
**To:** [Dan Mallett](#)  
**Cc:** [Pete Cleveland](#); [Rick Hartman](#); [Weber, Steven D.](#); [Pratt, Marirose](#); [Russo, Todd](#); [Dressler, Jason](#); [Tony Hobson](#)  
**Subject:** RE: NICB INFORMATION  
**Date:** Wednesday, April 28, 2021 4:01:56 PM

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Dan,

Thank you for sending the information. One question that I am sure I will get is when could the items be completed and the stripper begin operation? I realize it may be somewhat challenging as you dig into the remaining items, but do the best you can on the information you have at this time to provide an estimated date.

I will also let you know if a call is needed and if we have any additional questions.

Best,

Denis

Denis B. Kler  
U.S. EPA Region 4  
Enforcement and Compliance Assurance Division  
Policy, Oversight and Liaison Office  
Phone: 404-562-9199

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**From:** Dan Mallett <Dan.Mallett@new-indycb.com>  
**Sent:** Wednesday, April 28, 2021 3:50 PM  
**To:** Kler, Denis <Kler.Denis@epa.gov>  
**Cc:** Pete Cleveland <pete.cleveland@new-indycb.com>; Rick Hartman <rick.hartman@new-indycb.com>; Weber, Steven D. <steveweber@parkerpoe.com>; Pratt, Marirose <Pratt.Marirose@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Tony Hobson <tony.hobson@new-indycb.com>  
**Subject:** NICB INFORMATION

Good Afternoon Denis,

Thank you for responding. In my April 21 e-mail, I asked for additional time to provide information you requested, and suggested a conference call to discuss additional information you still may need to complete your report. If you have all the information you need, there may not be a need for a conference call. I have attached the map of the locations of H2S monitors at the mill. Below are measures that must be taken to return the stripper to service and the status of those measures:

## Action Plan to Re-Start Condensate Stripper

Summary of Required Steps		Status
1	Establish dedicated Team & Team Lead to accomplish tasks	Complete
2	P&ID walk down	Complete
3	Equipment maintenance review (outstanding work orders)	Complete
4	Utilities availability review (air, steam, electrical, etc.)	Complete
5	Secure anti-scale additive for startup/operation	Complete
6	Obtain DHEC approval for recommissioning	Request to DHEC
7	Reactivate DCS control points	90%
8	Spare parts availability review	Complete
9	Piping spool repairs/reinstalls	10%
10	Reinstall missing instruments/components	80%
11	Inspect incineration lines/nozzles at CBs for functionality	50%
12	Interlock validation	Schedule
13	Instrument validation	50%
14	Alarm validation	50%
15	Valve functional check – stroking	80%
16	HEX cleaning	Schedule
17	Stripper column/tray hydro-blasting	70%
18	SOP & Operator Training Review	Schedule
19	Develop detailed checkout plan Develop functional check-outs for I/O's Review proper arc-flash considerations in checkouts LOTO needs to remove blank @ Stripper Feed Pumps	80%
20	Develop detailed startup plan	50%
21	Pre-Startup Safety Review Meeting	Schedule
22	Perform hydraulic leak testing	Schedule
23	Re-perform leak testing under temperature and pressure	Schedule

Please let me know if you need additional information or if you wish to have a conference call to discuss. Thank you.

**DANIEL MALLET**

Environmental Manager

Office: (803) 981-8010

Mobile: (207) 951-6216



**From:** Kler, Denis [<mailto:Kler.Denis@epa.gov>]  
**Sent:** Wednesday, April 28, 2021 7:00 AM  
**To:** Dan Mallett <[Dan.Mallett@new-indycb.com](mailto:Dan.Mallett@new-indycb.com)>  
**Cc:** Pete Cleveland <[pete.cleveland@new-indycb.com](mailto:pete.cleveland@new-indycb.com)>; Rick Hartman <[rick.hartman@new-indycb.com](mailto:rick.hartman@new-indycb.com)>; Weber, Steven D. <[steveweber@parkerpoe.com](mailto:steveweber@parkerpoe.com)>; Pratt, Marirose <[Pratt.Marirose@epa.gov](mailto:Pratt.Marirose@epa.gov)>; Russo, Todd <[Russo.Todd@epa.gov](mailto:Russo.Todd@epa.gov)>; Dressler, Jason <[Dressler.Jason@epa.gov](mailto:Dressler.Jason@epa.gov)>  
**Subject:** RE: NICB INFORMATION

External E-Mail - Caution - This email originated outside of New-Indy. .

Dan,

I hope you are well. Andrew mentioned that we were supposed to have a call today to discuss what it would take to bring the steam stripper back online. It was my understanding that you would send the information to me and then we would schedule a call for later this week once we had time to review the information. I believe the call will be more productive if we have a day to review the information and then schedule a call to discuss the information. To confirm will you be able to send the steam stripper information and the H2S area monitor system information to me today? If so, we can schedule a call for tomorrow or Friday. Sorry for the misunderstanding. I look forward to hearing from you.

Regards,  
Denis

Denis B. Kler  
U.S. EPA Region 4  
Enforcement and Compliance Assurance Division  
Policy, Oversight and Liaison Office  
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**From:** Dan Mallett <[Dan.Mallett@new-indycb.com](mailto:Dan.Mallett@new-indycb.com)>  
**Sent:** Wednesday, April 21, 2021 4:04 PM  
**To:** Kler, Denis <[Kler.Denis@epa.gov](mailto:Kler.Denis@epa.gov)>  
**Cc:** Pete Cleveland <[pete.cleveland@new-indycb.com](mailto:pete.cleveland@new-indycb.com)>; Rick Hartman <[rick.hartman@new-indycb.com](mailto:rick.hartman@new-indycb.com)>; Weber, Steven D. <[steveweber@parkerpoe.com](mailto:steveweber@parkerpoe.com)>; Pratt, Marirose <[Pratt.Marirose@epa.gov](mailto:Pratt.Marirose@epa.gov)>  
**Subject:** NICB INFORMATION

Good afternoon Denis:

Following EPA's site visit, you asked for the following additional information:

1. What measures need to be taken to restart the stripper
2. Locations of the hydrogen sulfide monitors

Compiling the requested information has proven to be a more labor-intensive task than first anticipated. We have general information regarding the maintenance and regulatory measures that would need to be taken to restart the stripper, but we need to conduct a detailed inspection of the stripper to give you a complete answer since it has been idle for several months. We will complete that inspection this week or early next week. Additionally, we are in the process of mapping the highlighted process areas where H<sub>2</sub>S monitors are in use. For these reasons, we request an additional week to provide you with this information. We suggest that we send you an e-mail with this information by Wednesday of next week and schedule a conference call on that same day to discuss whether you need any additional information. Also, on the conference call, we can discuss whether the items we provide you are confidential business information. You also will be providing us with the videos and photographs for our initial CBI determination, but we understand that it will take some additional time on your end to get those videos and photographs downloaded and ready for our review. Please let us know if it is acceptable to provide you this information next Wednesday and to have a conference call next Wednesday (and times on Wednesday that a conference call works for your team). We appreciate your assistance.

Regards,

Dan Mallett

**DANIEL MALLET**

Environmental Manager

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**From:** Kler, Denis [<mailto:Kler.Denis@epa.gov>]

**Sent:** Wednesday, April 21, 2021 12:51 PM

**To:** Dan Mallett <[Dan.Mallett@new-indycb.com](mailto:Dan.Mallett@new-indycb.com)>

**Cc:** Pete Cleveland <[pete.cleveland@new-indycb.com](mailto:pete.cleveland@new-indycb.com)>; Rick Hartman <[rick.hartman@new-indycb.com](mailto:rick.hartman@new-indycb.com)>; Weber, Steven D. <[steveweber@parkerpoe.com](mailto:steveweber@parkerpoe.com)>; Pratt, Marirose <[Pratt.Marirose@epa.gov](mailto:Pratt.Marirose@epa.gov)>

**Subject:** RE: NICB INFORMATION

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Dan,

Happy Wednesday. I wanted to follow up with you about whether the documents and the email contain confidential business information. I look forward to hearing from you.

Best,

Denis

Denis B. Kler

U.S. EPA Region 4

Enforcement and Compliance Assurance Division

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**From:** Kler, Denis

**Sent:** Tuesday, April 20, 2021 8:39 AM

**To:** Dan Mallett <[Dan.Mallett@new-indycb.com](mailto:Dan.Mallett@new-indycb.com)>

**Cc:** Pete Cleveland <[pete.cleveland@new-indycb.com](mailto:pete.cleveland@new-indycb.com)>; Rick Hartman <[rick.hartman@new-indycb.com](mailto:rick.hartman@new-indycb.com)>; Weber, Steven D. <[steveweber@parkerpoe.com](mailto:steveweber@parkerpoe.com)>; Pratt, Marirose <[Pratt.Marirose@epa.gov](mailto:Pratt.Marirose@epa.gov)>

**Subject:** RE: NICB INFORMATION

Dan,

Thank you for sending the information. Does any of the information you provided in the email or the attachments contain any confidential business information?

Regards,

Denis

Denis B. Kler

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Enforcement and Compliance Assurance Division

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**From:** Dan Mallett <[Dan.Mallett@new-indycb.com](mailto:Dan.Mallett@new-indycb.com)>

**Sent:** Monday, April 19, 2021 3:46 PM

**To:** Kler, Denis <[Kler.Denis@epa.gov](mailto:Kler.Denis@epa.gov)>

**Cc:** Pete Cleveland <[pete.cleveland@new-indycb.com](mailto:pete.cleveland@new-indycb.com)>; Rick Hartman <[rick.hartman@new-indycb.com](mailto:rick.hartman@new-indycb.com)>; Weber, Steven D. <[steveweber@parkerpoe.com](mailto:steveweber@parkerpoe.com)>

**Subject:** NICB INFORMATION

Good day Denis,

As committed during the 4/15/21 review session closing meeting, attached please find the following information:

- Calendar Year 2021 NCG Venting Incident Summary
- P&ID for the NCG collection systems.
- The P&ID for the stripper tank hard pipe to the ASB.
- Schematic of the DCS screen for the NCG system.

Additionally, while on the ASB, the number of the aerator at which readings were being collected was requested. This aerator is #46.

Outstanding items at this time to be provided by close of business 4/21/21 include:

- Stripper return to service information
- Hydrogen Sulfide monitor locations/configuration

Please contact me if you have further information requirements.

Best Regards.

**DANIEL MALLET**

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